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6 GoDaddy Inc., GoDaddy.com, LLC  
and 123-Reg Limited

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8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF ARIZONA

10 Crisby Studio AB, a Swedish limited liability  
11 company, Niklas Thorin, a Swedish resident,  
12 and Prime Loyalty, a New York limited  
liability company,

13 Plaintiffs,

14 v.

15 GoDaddy, Inc. a Delaware corporation,  
16 GoDaddy.com, LLC, a Delaware corporation,  
and 123-Reg Limited, a UK company,

17 Defendants.

18 Case No.: 2:24-cv-02165-SMB

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**DEFENDANT 123-REG  
LIMITED'S NOTICE OF  
MOTION AND MOTION TO  
DISMISS PLAINTIFFS' FIRST  
AMENDED COMPLAINT FOR  
LACK OF PERSONAL  
JURISDICTION AND FAILURE  
TO STATE A CLAIM**

1 TO ALL PARTIES AND ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that Defendant 123-Reg Limited (“123-Reg”) hereby moves  
3 this Court for an Order dismissing Plaintiffs Crisby Studio AB, Niklas Thorin, and Prime  
4 Loyalty, LLC’s (collectively, “Plaintiffs”) First Amended Complaint (“FAC”), pursuant to  
5 Rules 12(b)(2) and 12(b)(6) of the Federal Rules of Civil Procedure.

6 123-Reg Motion’s under Rule 12(b)(2) is made on the grounds that 123-Reg is not  
7 subject to personal jurisdiction in this forum. 123-Reg’s Motion under Rule 12(b)(6) is made  
8 on the grounds that Plaintiffs: (1) failed to abide by the pleading standards in Fed. R. Civ. P.  
9 8, impermissibly lumping together all “Defendants” as a collective whole throughout their  
10 allegations in the FAC; and (2) did not set forth sufficient factual allegations to state a claim  
11 against 123-Reg, and cannot do so as a matter of law.

12 This Motion is based on this Notice, the attached Memorandum of Law, the  
13 concurrently filed Declaration of Andrew Gradon, all pleadings and documents concerning  
14 this matter contained in the Court’s file, any other matters of which this Court may take judicial  
15 notice, and such further evidence and oral argument as may be presented at any hearing of this  
16 Motion.

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18 Dated: November 12, 2024

COZEN O’CONNOR  
Jeffrey M. Monhait

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By: s/Jeffrey M. Monhait  
Jeffrey M. Monhait

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Attorneys for Defendants  
GoDaddy Inc., GoDaddy.com, LLC,  
and 123-Reg Limited

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies, under penalty of perjury under the laws of the State of Arizona that I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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## Counsel for Plaintiffs

## Counsel for Plaintiffs

SIGNED AND DATED this 12th day of November, 2024 at Philadelphia,  
Pennsylvania.

COZEN O'CONNOR

By: s/ Jeffrey M. Monhait  
Jeffrey M. Monhait